

EXHIBIT 13

From: Victor Otten <vic@ottenlawpc.com>
Sent: Thursday, July 20, 2017 11:30 AM
To: jacob.song@kutakrock.com; ed.richards@kutakrock.com
Cc: Kurt A. Franklin; Samantha Wolff; Kavita Tekchandani
Subject: Documents not produced

Jacob,

In reviewing the deposition testimony of Tony Best, he mentions several items that I do not believe have been provided in your discovery responses:

1. The City used camcorders to police Lunada Bay. Both MLK events were recorded. (P. 48, Ins 9-8)
2. Operations plan and follow up Re undercover officers at MLK Day 2014 or 2015. (P. 113, Ins 5-7)

Please provide the above documents ASAP.

Vic

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Please consider the environment before printing this e-mail message.

EXHIBIT 14

From: Samantha Wolff
Sent: Monday, July 24, 2017 12:45 PM
To: Song, Jacob (Jacob.Song@KutakRock.com); christopher.glos@kutakrock.com;
Ed.Richards@kutakrock.com; Hewitt, Antoinette P. (Antoinette.Hewitt@KutakRock.com)
Cc: Kurt A. Franklin; Victor Otten; Ann D. Ghiorso; Lisa M. Pooley
Subject: Lunada Bay Discovery

Dear All,

We wanted to let you know that at tomorrow morning's telephonic hearing with Magistrate Judge Oliver, we intend to raise the issue of Sgt. Barber being instructed not to answer a line of questions relating to his personal cell phone, including the preservation of evidence and his cell phone number.

Sincerely,
Samantha

Samantha Wolff
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EXHIBIT 15

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION - LOS ANGELES

CORY SPENCER, ET AL.,)	CASE NO: 2:16-CV-02129-SJO-RAO
)	
Plaintiffs,)	CIVIL
)	
vs.)	Los Angeles, California
)	
LUNADA BAY BOYS, ET AL.,)	Tuesday, September 5, 2017
)	
Defendants.)	(10:05 a.m. to 10:59 a.m.)

TELEPHONIC HEARING ON OUTSTANDING DISCOVERY DISPUTES

BEFORE THE HONORABLE ROZELLA A. OLIVER,
UNITED STATES MAGISTRATE JUDGE

Appearances:	See Next Page
Court Reporter:	Recorded; CourtSmart
Deputy Clerk:	Sandra L. Butler
Transcriber:	Exceptional Reporting Services, Inc. P.O. Box 18668 Corpus Christi, TX 78480-8668 361 949-2988

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KEVIN FLAUTT, ESQ.

1 **MS. WOLFF:** And it's from Captain Tony Best to all
2 patrol personnel. And it's essentially discussing what the
3 city's response will be or should be to this planned event on
4 January 20th, 2014.

5 **THE COURT:** I see what you're saying. Okay. And was
6 this -- and when was it produced?

7 **MS. WOLFF:** August 3rd, I believe, 2016 -- I'm sorry,
8 2017.

9 **THE COURT:** Okay. Mr. Song, do you have any response
10 to that? It's kind of a -- would seem to be clearly -- clearly
11 responsive.

12 **MR. GLOS:** This is Christopher Glos. If I could
13 respond to that? I was at the deposition of Tony Best. It's
14 the first time that the report had been identified. It was the
15 first that it had been known. I don't recall the exact date of
16 Mr. Best's deposition, but I think it was either late June or
17 late July.

18 The report was produced as quickly as it could, after
19 it was identified. The city has produced something like 25,000
20 documents. We've expended something close to 100,000 --- if
21 not more -- dollars, on ESI. We've used the terms that the
22 Plaintiffs have provided us to do searches electronically for
23 documents throughout the city system.

24 I don't think it's very fair for the Plaintiffs to
25 conclude that we haven't complied or done anything with respect

CERTIFICATION

I certify that the foregoing is a correct transcript from the
electronic sound recording of the proceedings in the above-
entitled matter.

A handwritten signature in cursive script, appearing to read "Toni Hudson", is positioned above a horizontal line.

September 9, 2017

TONI HUDSON, TRANSCRIBER